

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION**

DWIGHT McDONALD, CHRISTOPHER
ATKINS and TIMOTHY PROVOST,
Each Individually and on Behalf
of All Others Similarly Situated,

Plaintiffs

vs.

M2 MANAGEMENT INC.,
and MICHAEL P. TRAINOR,

Defendants

No. 21-cv-6260

DECLARATION OF MICHAEL P. TRAINOR

I, Michael P. Trainor, declare as follows:

1. I make the statements in this Declaration based on my personal knowledge and based on records maintained in the ordinary course of business. If called upon to do so, I could and would testify competently about these statements.

Michael P. Trainor’s Residence and the Founding M2 Management, Inc.

2. I am a citizen of the United States, and I reside in New Hampshire.

3. I was at the times referenced in the Complaint filed in this case, the president M2 Management, Inc. (“M2”).

4. M2 is a New Hampshire corporation incorporated in the State of New Hampshire.

5. M2 was incorporated in 2015.

6. M2 maintains a principal place of business at 53 Diamond Ledge Rd, Thorton, NH 03285.

7. Starting in 2015, M2 maintained its principal place of business at 1039 Cherry Valley Rd, Gilford, NH 03249.

8. In May 2021, M2 changed its principal place of business to 53 Diamond Ledge, Rd in Thorton, NH.

9. This address, along with additional contact information such as M2's email address, is listed on the New Hampshire Secretary of State's website.

10. A screenshot of the Secretary of State's website with information related to M2 is attached to this Declaration as Exhibit A.

11. Exhibit A is a fair and accurate copy of the information found on the New Hampshire Secretary of State's website.

12. The information found on the Secretary of State's website is true and correct with the exception of the address for the registered agent found on page 3 of Exhibit A.

13. The address listed for M2's registered agent is incorrect as it contains a clerical error listing the address as "Gherry Valley Rd" instead of the correct address at Cherry Valley Rd.

14. The Cherry Valley Rd address is a residential address. I, however, no longer reside at that address and it is not the correct address for myself as M2's registered agent.

15. I have not lived at the Cherry Valley address since May 2021.

16. In May 2021, I moved from Gilford, NH to Moultonborough, NH.

17. Although I no longer reside in Moultonborough, I currently reside in NH.

18. I have never maintained an address in Manchester, New Hampshire or Astoria, New York.

19. M2 has never maintained an address in Manchester, New Hampshire or Astoria, New York.

M2's P.O. Box

20. Since its formation in 2015, M2 has maintained a P.O. box in Gilford, NH.

21. The address for this P.O. box is P.O. Box 7045 in Gilford, NH 03247.

22. This address is also listed on the New Hampshire Secretary of State's website as seen on Exhibit A.

23. As the owner of M2, I have regularly used this P.O. box for business purposes since it was opened in 2015.

24. Since opening this P.O. box in 2015, I have never had any issues with lost mail or receiving mail and/or packages at this address. I have received certified mail from my P.O. box in the past without any issue.

25. In the rare instances where an item could not be delivered to my P.O. box, I would receive a note in the P.O. box requesting that I pick up the mail from post office personnel. In which case, it was my practice and custom to do so.

26. I received no such notice for any type of undeliverable mail related to any mail or documents related to this case.

27. From November 2021 through August 2024, I regularly used and check this P.O. box.

28. During that time, I never received any summons, mail, or documents related to the lawsuit pending in the Northern District of Illinois.

29. The first I learned of this lawsuit was on August 1, 2024 when I received a letter from the State court in New Hampshire that there was an attempt to domestic a judgment against M2 and me in New Hampshire.

30. This was the first time I learned of any against M2 and myself in the Northern District of Illinois.

31. I am the only individual with access to the P.O. box.

M2's Regular Business Practices

32. As the president of M2, I am personally familiar with M2's business practices including how M2 responds to the receipt of legal documents or other documents that may require immediate attention.

33. I receive and regularly check for all mail addressed to M2 and sent to the P.O. box in Gilford, NH.

34. If M2 receives mail at the Gilford P.O. box it is my practice to open that mail to determine the nature of the correspondence and whether there is any time sensitive return date.

35. I further take this mail to M2's office in Thorton, NH where I handle the matter myself.

36. In the event that M2 receives a legal document at the Gilford P.O. box, it is my practice to make a copy of the correspondence and determine whether M2 requires legal counsel for the matter.

37. If legal counsel is needed, I provide the relevant information to the attorneys M2 retains.

38. If M2 elects to handle the matter without counsel, I will personally handle the return correspondence myself.

39. M2 also receives mail at the Thorton address and the email address listed on Exhibit A. The Thornton address is M2's principal office address.

40. It is M2's custom and practice to respond to any legal or time sensitive documents sent to the Thorton office or to its email.

41. M2 did not receive any legal documents, summons, or notice related to the lawsuit filed in the Northern District of Illinois at the Gilford P.O. box, the Thorton office, or via electronic

mail.

42. Had such notice or mailing been sent to either address or via email I would have responded or otherwise acted as soon as possible per M2's custom and practice.

43. I received no such notification and no legal documents, summons, or certified mail related to this matter were brought to my attention from November 2021 through August 2024.

44. The first I learned of the Northern District lawsuit was when I received the aforementioned letter from the State Court of New Hampshire on August 1, 2024 at the Gilford P.O. box.

The Laconia Daily Sun

45. I am familiar with the publication used by Plaintiffs in an attempt to serve M2 and me.

46. The Laconia Daily Sun is a daily newspaper that is distributed for free.

47. I have commonly seen the Laconia Daily Sun at gas stations in New Hampshire.

48. I do not subscribe to the Laconia Daily Sun or have it otherwise delivered to my personal address.

49. Similarly, M2 does not subscribe to the Laconia Daley Sun or have it delivered to its business address.

50. I do not personally read the Laconia Daily Sun.

51. From my review of the Laconia Daily Sun's website, the Laconia Daily Sun circulates in the following towns: Laconia, Gilford, Meredith, Weirs Beach, Center Harbor, Belmont, Moultonborough, Winnisquam, Sanbornton, Tilton, Gilmanton, Alton, New Hampton, Plymouth, Bristol Ashland, Holderness, Northfield, Franklin, Loudon, and Wolfeboro.

52. As previously mentioned, I lived in Gilford, NH until I moved to Moultonborough in May 2021.

53. Moultonborough is approximately 30 miles from Gilford, NH.

54. In May 2021, M2's principal address was in Thorton, NH, approximately 50 miles from Gilford, NH.

55. Per the Laconia Daily Sun's website, they do not circulate in Thorton, NH.

56. At the time notice of this suit was published, which I understand to be May 13, May 20, and May 27, 2022, I was outside the State of New Hampshire conducting business in Illinois and Pennsylvania.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 27, 2025, New Hampshire.

Signed by:

431962E18DCD471...
Michael P. Trainor

Exhibit A

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Business Information

Business Details

Business Name: M2 MANAGEMENT, INC.	Business ID: 724269
Business Type: Domestic Profit Corporation	Business Status: Good Standing
Business Creation Date: 04/10/2015	Name in State of Incorporation: Not Available
Date of Formation in Jurisdiction: 04/10/2015	
Principal Office Address: 53 Diamond Ledge Rd, Thornton, NH, 03285, USA	Mailing Address: PO Box 7045, Gilford, NH, 03247, USA
Citizenship / State of Incorporation: Domestic/New Hampshire	
	Last Annual Report Year: 2025
	Next Report Year: 2026
Duration: Perpetual	
Business Email: mike@m2management.org	Phone #: 603-682-1722
Notification Email: mike@m2management.org	Fiscal Year End Date: NONE

Principal Purpose

S.No	NAICS Code	NAICS Subcode
1	OTHER / entertainment consulting and management	

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Principals Information

Name/Title	Business Address
mike trainor / President	po box 7045, Gilford, NH, 03247, USA
mike trainor / Secretary	po box 7045, Gilford, NH, 03247, USA
mike trainor / Director	po box 7045, Gilford, NH, 03247, USA
mike trainor / President	po box 7045, Gilford, NH, 03247, USA
mike trainor / President	7045 po, Gilford, NH, 03247, USA

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Registered Agent Information

Name: Trainor, Mike

Registered Office Address: 1039 Gherry Valley Rd, Gilford, NH, 03249, USA

Registered Mailing Address: 1039 Gherry Valley Rd, Gilford, NH, 03249, USA

Trade Name Information

No Trade Name(s) associated to this business.

Trade Name Owned By

No Records to View.

Trademark Information

Trademark Number	Trademark Name	Business Address	Mailing Address
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No records to view.

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